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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

ROBERT ALBERS,

Case No. 4:16-cv-05147-SAB

Plaintiff.

REPORT OF PARTIES DISCOVERY
PLANNING MEETING

v.

NATIONSTAR MORTGAGE, LLC a
Delaware Limited Liability Company;
and QUALITY LOAN SERVICE
CORPORATION OF WASHINGTON, a
Domestic Corporation

Defendants.

1. Pursuant to Fed.R.Civ.P.26(f), a meeting was held on August 28, 2017. Participating in the meeting were:

Keith Karnes Attorney for Plaintiff and David Elkanich, Attorney for Plaintiff

Nationstar Mortgage, LLC

2. Pre-discovery Disclosures. The parties have agreed to forgo the pre-discovery disclosures pursuant to local rules and disclosed the information required by R. 26(a)(1).

REPORT OF PARTIES DISCOVERY PLANNING MEETING-1

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:
 - a. Discovery will be needed on the following subjects: all issues relevant to the complaint and defenses.
 - b. All discovery commenced in time to be completed by April 6, 2018
4. Other Items. The parties do not request a conference with the Court before entry of the scheduling order.
 - a. The parties request a pretrial conference in July 2018.
 - b. The parties should be allowed until November 27, 2017 to join additional parties and to amend pleadings.
 - c. All potentially dispositive motions must be filed by May 3, 2018.
 - d. Experts will be disclosed in accordance to Rule 26(a)(2).
 - e. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

from Plaintiff by July 1, 2018

from Defendant by July 1, 2018
 - f. Parties should have 10 days after service of final lists of witnesses and exhibits to list objections under Rule 25(a)(3).
 - g. This case should be ready for trial by August 2018 and should take approximately five (5) days.
 - h. Pursuant to Fed.R.Civ.Pro.5(b)(2)(E) the parties agree to accept service of all documents by e-mail.

DATED: September 8, 2017

/s/ Keith D. Karnes
Keith D. Karnes, WSBA #35000
Attorney for Plaintiff

REPORT OF PARTIES DISCOVERY PLANNING MEETING-2

CERTIFICATE OF SERVICE

I, Keith Karnes, certify that I filed the foregoing document via ECF which will in turn serve:

David J. Elkanich
Holland & Knight, LLP
2300 US Bancorp Tower
111 SW Fifth Avenue Ste 2300
Portland, OR 97204
serve.dje@jklaw.com

Robert McDonald
Quality Loan Service Corp. of Washington
108 1st Ave. Ste 202
Seattle, WA 98104-2538
mrmcdonald@qualityloan.com

This document was also served via email to the above parties.

DATED September 8, 2017.

/s/ Keith D. Karnes
Keith D. Karnes, WSAB #35000
Attorney for Plaintiff